

1 The Honorable James L. Robart  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

10 PROMEDEV, LLC dba RELIEF FACTOR,

Civil Action No. 2:22-cv-01063-JLR

11 Plaintiff,

~~STIPULATED~~ ORDER TO SEAL  
PREVIOUSLY FILED EXHIBIT

12 v.

13 ROBY WILSON (individually), and  
14 MAXXIMEDIA ADVERTISING CO., and  
IMAGIPIX CORPORATION,

15 Defendants.

16 I. STIPULATION

17 Plaintiff/Counterclaim Defendant Promedev, LLC dba Relief Factor ("Promedev") and  
18 Defendants/Counterclaimants Roby Wilson, MaXXiMedia Advertising Co., and Imagipix  
19 Corporation's ("MaXXiMedia") hereby agree and ask that the Court seal Exhibit C to the  
20 Declaration of Gregor A. Hensrude, previously and inadvertently filed in connection with  
21 MaXXiMedia's Motion for Summary Judgment and currently under provisional seal as Docket  
22 Entry No. 57.

23 The parties met and conferred on January 19, 2024, in order to reach agreement regarding  
24 the need to file this document under seal, to minimize the amount of material filed under seal, and  
25 to explore redaction and other alternatives to filing under seal. The parties agree that the exhibit  
26 requested to be sealed is subject to the parties' Stipulated Protective Order, Docket entry 38, filed  
27

{PROPOSED} STIPULATED ORDER TO SEAL PREVIOUSLY  
FILED EXHIBIT- 1

KLINEINST PC  
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on February 17, 2023, and was inadvertently filed as an exhibit to a declaration. Specifically, Promedev designated this document as “Confidential” because it is an agreement between Promedev and a marketing agency containing non-public financial information. The parties respectfully request that Exhibit C to the Declaration of Gregor A. Hensrude be sealed.

## II. ORDER

THIS MATTER came before the Court on Plaintiff/Counterclaim Defendant Promedev, LLC dba Relief Factor ("Promedev") and Defendants/Counterclaimants Roby Wilson, MaXXiMedia Advertising Co., and Imagipix Corporation's ("MaXXiMedia") stipulation to seal Exhibit C to the Declaration of Gregor A. Hensrude previously filed in the Court Record, Docket entry 57, and currently under a provisional seal.

The exhibit requested to be sealed is subject to the parties' Stipulated Protective Order, Docket entry 38, filed on February 17, 2023, and was inadvertently filed as an exhibit to a declaration. The parties respectfully request that Exhibit C to the Declaration of Gregor A. Hensrude be sealed.

ACCORDINGLY, IT IS HEREBY ORDERED, ADJUDGED AND DECREED that:

1. The Clerk shall seal Exhibit C to the Declaration of Gregor A. Hensrude, currently filed under provisional seal as docket entry 57.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that:

2. Access to the sealed documents is limited to the respective parties to this proceeding, their counsel of record, and such other individuals as the parties to this proceeding may mutually agree, or the Court may designate to be allowed access to the same.
  3. Defendants are granted the right to re-file, on the public docket, a redacted copy of the exhibit
  4. Access to the sealed records will be available only in the Clerk's Office.
  5. In the event of an application for the opening of the sealed document, a hearing

1 shall be noted and notice shall be given or attempted to be given to the parties,  
2 through their counsel of record.

3 DATED: January 31, 2024

4   
5 THE HONORABLE JAMES L. ROBART  
6

7 Submitted by:

8 KLINEDINST PC

9 s/ Louiza M. Dudin

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27 Relief Factor

[PROPOSED] STIPULATED ORDER TO SEAL PREVIOUSLY  
FILED EXHIBIT- 3

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